

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:22-cr-54(2)

UNITED STATES OF AMERICA

v.

DONTE RAMONE HOWARD

)  
)  
) INDICTMENT  
)  
)

The Grand Jury charges that:

COUNT ONE

Beginning on or about November 1, 2020, the exact date being unknown to the Grand Jury, and continuing up to on or about February 16, 2022, in the Eastern District of North Carolina, and elsewhere, the defendant, DONTE RAMONE HOWARD, did knowingly and intentionally combine, conspire, confederate, agree, and have a tacit understanding with other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute one thousand (1,000) kilograms or more of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about September 8, 2021, in the Eastern District of North Carolina, the defendant, DONTE RAMONE HOWARD, did knowingly and intentionally possess

with intent to distribute a quantity of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

### COUNT THREE

On or about September 8, 2021, in the Eastern District of North Carolina, the defendant, DONTE RAMONE HOWARD, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm, and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

### COUNT FOUR

On or about September 8, 2021, in the Eastern District of North Carolina, the defendant, DONTE RAMONE HOWARD, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, as charged in Count Two of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

(Remainder of page left intentionally blank.)

### ALLEGATION OF PRIOR CONVICTION

For purposes of Title 21, United States Code, Sections 841(b) and 851, the defendant, DONTE RAMONE HOWARD, committed the violation alleged in Count Two of the Indictment after a prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

### FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

Forfeiture Money Judgment:

- a) A sum of money representing the gross proceeds of the offense(s) charged herein, in the amount of at least \$9,000,000.00.
- b) \$514,476.73 in U.S. currency, seized on September 8, 2021, from Apt. 324, 200 Park at North Hills, Raleigh, NC 27609.
- c) A Ruger 5.7 firearm, seized on September 8, 2021, from Apt. 324, 200 Park at North Hills, Raleigh, NC.
- d) \$195,786.00 in U.S. currency, seized on February 16, 2022, from 3306 Black Stallion Court, Zebulon, NC.
- e) A Glock 19 firearm, serial number BTCH200, seized on February 16, 2022, from 3306 Black Stallion Court, Zebulon, NC.
- f) A Smith & Wesson M&P Shield Plus, serial number JLE0936, seized on February 16, 2022, from 3306 Black Stallion Court, Zebulon, NC.

(Remainder of page left intentionally blank.)

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL, *1*

**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE:

*3-15-2022*

MICHAEL F. EASLEY, JR.  
United States Attorney

*by: D. Rainwater*  
BY: J.D. KOESTERS

Assistant United States Attorney